

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:

GEORGE L FRANIC,  
DIAN SUSAN FRANIC

Case No.: 22-11421

Judge: JKS

Chapter: 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION**

The debtor in this case opposes the following (choose one):

1. ☒ Motion for Relief from the Automatic Stay filed by Phoenix Funding Inc.,  
creditor,

A hearing has been scheduled for November 14, 2024, at 10:00 am.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

- ☐ Certification of Default filed by \_\_\_\_\_,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (choose one):

☐ Payments have been made in the amount of \$ \_\_\_\_\_, but have not  
been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):

We have prepared and filed a modified plan calling for the refinance (reverse mortgage) of our property within the next 90 days. We are in the process of finalizing our application and have been informed by the lender that we should have an answer this month. The secured creditor is adequately protected by the equity in our property while we look to refinance and pay off our case in full.

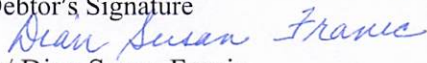
3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: October 29, 2024 *10/29/24*



/s/ George L Franic  
Debtor's Signature

Date: October 29, 2024 *10/29/24*



/s/ Dian Susan Franic  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.